

LAW OFFICE OF VINCENT TOOMEY

VINCENT TOOMEY*
THOMAS J. MARCOLINE**
HEATHER P. HARRISON

*ALSO MEMBER CONNECTICUT BAR
**ALSO MEMBER MASSACHUSETTS BAR

3000 MARCUS AVENUE, SUITE 1W10
LAKE SUCCESS, NEW YORK 11042
516-358-5690

ASSOCIATE
JASMINE L. BROWN

August 18, 2023

BY ECF ONLY

Judge Loretta A. Preska
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2220
New York, NY 10007

RE: Moore v. Hadestown Broadway, LLC
Civil Action No. 23-CV-4837

Dear Judge Preska:

This office represents Defendant Hadestown Broadway, LLC (“Defendant”) in the above-referenced employment discrimination case. In accordance with the Waiver of the Service of Summons (Docket Entry 10) filed on July 10, 2023, Defendant’s answer or motion under Rule 12 is due August 21, 2023.

Defendant anticipates filing a motion to dismiss in lieu of an answer. We write to request permission to file a 24 page memorandum of law in support of the motion, exceeding the 20 page limit set forth in Your Honor’s Individual Practices. The additional pages are necessary because in addition to expected arguments related to the failure to state a claim upon which relief can be granted, we have extensive argument regarding Defendant’s constitutional affirmative defense to the claims.

Thank you for your consideration.

Respectfully submitted,
LAW OFFICE OF VINCENT TOOMEY



Heather P. Harrison

cc: Joshua Mathew Friedman
PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW, PLLC
Attorneys for Plaintiff
Via ECF